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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

WAYNE A. HAGENDORF,

Plaintiff,

v.

NATIONSTAR MORTGAGE LLC,

Defendant.

Case No.: 2:21-cv-00231-GMN-BNW

**AMENDED STIPULATION AND ORDER  
FOR EXTENSION OF RESPONSIVE  
PLEADING DEADLINE**

**[FIRST REQUEST]**

Nationstar Mortgage LLC and Wayne A. Hagendorf stipulate to extend the responsive pleading deadline. Hagendorf filed his complaint on February 12, 2021. ECF No. 1. Nationstar was served with the complaint on February 17, 2021. Nationstar's deadline to respond to the complaint was March 10, 2021. The parties agree Nationstar shall have until **Monday, April 26, 2021** to file a response to the complaint. Nationstar will use this additional time to review the loan documents applicable to this case.

Nationstar and Hagendorf acknowledge this stipulation is being filed after the March 10 deadline. Nationstar communicated with Hagendorf prior to the deadline, reaching out on March 8, 2021, to request a stipulated extension. At that time, Nationstar was still within its answering deadline and thus did not consider excusable neglect standard in the request or in drafting the stipulation to extend. By way of further explanation, counsel for Nationstar initially requested its


extension from counsel for Hagendorf for "personal reasons." Those reasons are medical issues undersigned counsel is dealing with that has required extended time away from the office which in turn required a longer time to review the loan documents in this case, as stated in the parties' initial stipulation to extend as the basis for the extension. Shortly thereafter, this case was internally transferred to another Akerman associate to take over handling of the case as a result of undersigned counsels' ongoing medical treatment. Respectfully, the failure to file this stipulation prior to the March 10 deadline is a result of oversight constituting excusable neglect. LR IA 6-1(a). Neither Nationstar nor Hagendorf will be prejudiced by the brief extension.

This is the first request for an extension of this deadline and is made in good faith without the purpose of undue delay.

DATED April 22, 2021.

AKERMAN LLP	FREEDOM LAW FIRM
<u>/s/ Donna M. Wittig</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 DONNA M. WITTIG, ESQ. Nevada Bar No. 11015 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89134  Attorneys for Nationstar Mortgage LLC	<u>/s/ George Haines</u> GEORGE HAINES, ESQ. Nevada Bar No. 9411 Beltway Corporate Center 8985 South Eastern Avenue, Suite 350 Las Vegas, Nevada 89123  Attorney for Wayne A. Hagendorf

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: April 26, 2021

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